

Proceeding: In the Matter of 1998 Biennial Regulatory Review -- Amendment of Part of the ☐ Record 1 of 1
Applicant Name: Arthur P. Harris
Proceeding Name: 98-143 Author Name: 15200722
Lawfirm Name:
Contact Name: applicant_name Contact Email: n2ah@sprynet.com
Address Line 1: 2 Brocton Lane
Address Line 2:
City: Kings Park State: NY
Zip Code: 11754 Postal Code: 4102
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The following comments are submitted in response to FCC Notice of Proposed Rule Making (NPRM) WT Docket No. 98-143.

In this proceeding, the Commission proposes to streamline the Amateur Radio license structure by eliminating two of the six current license classes.

Interestingly, in the most recent restructuring (1991) the Commission increased the number of license classes from five to six with the introduction of the no-code Technician class. I'm concerned that this frequent modification of the license structure undermines stability and may have a negative impact on the Amateur service. Having said that, I do agree that the Novice class has outlived its usefulness and that the license structure could be simplified by eliminating it. However, I believe that the Technician Plus class serves a useful purpose as an entry point to HF privileges and should be kept.

License Structure

The three highest license classes (Extra, Advanced, and General) have a distinct and logical set of requirements and privileges. However, as the Commission points out, "there appears to be an unnecessary overlap between the Novice, Technician, and Technician Plus license classes."

Technician Plus licensees enjoy the same HF privileges as Novices in addition to the VHF/UHF privileges of the Technician Class. The fact that large numbers of Technician licensees have chosen to upgrade to Technician Plus by passing a 5 WPM code test demonstrates that there is strong interest in these entry-level HF privileges.

Eliminating both the Novice and Technician Plus classes, as proposed by the Commission, would deprive amateurs of this entry-level HF experience. Furthermore, since the Commission proposes to "grandfather" existing Novice and Technician Plus licensees, six classes would essentially remain from a record-keeping standpoint.

Since Novice licensees represent only about 10 percent of all amateurs, a more logical approach would be to keep the Technician Plus class and upgrade existing Novices to Technician Plus. This would eliminate the overlap in the current license structure, eliminate the Novice written exam, and still provide an entry-level HF option. While in general I oppose upgrading licensees without further testing, I think in this case the benefits far outweigh any disadvantages. The resulting license structure and requirements would be as follows:

Class	Written Elements	Code Speed	
Extra	3A, 3B, 4A, 4B	20 WPM	(See discussion of code requirements below.)
Advanced	3A, 3B, 4A	10 WPM	
General	3A, 3B	10 WPM	
Tech Plus	3A	5 WPM	
Technician	3A	None	

Note: The material covered in current Element 2A (Novice) should be integrated into Element 3A.

Telegraphy

Contrary to much of the rhetoric, telegraphy continues to be a very popular mode of communication among radio amateurs. On the HF bands, telegraphy is second only to SSB telephony in popularity. It is unquestionably more popular than any of the other digital modes. On the VHF, UHF, and microwave bands, much of the serious weak-signal work (e.g., moonbounce, meteor scatter, etc.) is conducted using telegraphy.

The Extra class telegraphy sub-bands are highly valued by amateurs involved in long distance "DX" communication. Much of the operation in these sub-bands is conducted at high speeds by highly proficient operators. Since access to these telegraphy sub-bands is the primary benefit of upgrading to Extra class, and since examination requirements should correlate to privileges earned, it is appropriate that the Extra Class code test be very challenging. Therefore, I strongly urge the Commission to keep the 20 WPM Extra Class code requirement.

Some amateurs have had difficulty attaining the skills required to pass the 13 WPM code test required for General and Advanced class licenses. There is some evidence that a "barrier" exists at about 12 WPM that is often difficult to overcome. Some amateurs will suggest that the requirement be lowered to 5 WPM. However, I believe that while 5 WPM is appropriate for entry-level operation, it does not represent an adequate skill level for mainstream HF operation. Communication at 5 WPM is extremely slow and laborious. Requiring applicants to attain proficiency at 10 WPM or more will enable them to communicate more effectively. Most applicants should be able to attain proficiency at 10 WPM without undue effort. Therefore, I suggest that the Commission reduce the code requirement for the General and Advanced classes to 10 WPM.

The Technician Plus license has supplanted the Novice as the entry point to HF for most amateurs. It provides a valuable learning experience in which amateurs are motivated to sharpen their HF operating skills. Its modest requirements are appropriate for the limited HF privileges it grants. The Commission should keep the Technician Plus class (with privileges modified as discussed below) and keep the code requirement for this class at 5 WPM.

Novice Band Conversion

The Commission implemented a significant expansion of the HF voice sub-bands in the 1970's. Some additional "phone-band" expansion was implemented in the early 1980's. Both of these actions reduced the spectrum available for telegraphy and digital modes. During the past decade, the use of various digital modes has grown significantly. These digital modes currently share band space with telegraphy.

In view of the fact that significant phone-band expansion has already taken place, and because of the growing interest in digital communication modes combined with the continued popularity of telegraphy, I urge the Commission to make the existing Novice telegraphy sub-bands available for digital communication modes rather than for expanded voice privileges.

To better integrate existing Novice and Technician Plus licensees into the mainstream of amateur radio and to provide them with enhanced opportunities to advance their skills, the Commission should grant them expanded telegraphy privileges within the General class portions of the 80, 40, 15, and 10 meter bands. No new voice privileges should be

granted, and Novice and Technician Plus licencees should continue to be limited to 200 watts of power in the HF bands.

Summary

As an active amateur radio operator and Volunteer Examiner (ARRL VEC), I believe the current license structure is basically sound. It requires only minor modification to reflect the diminished role of the Novice class license.

Five license classes are necessary to ensure adequate flexibility and to provide the incentives necessary to maintain the high standards of the Amateur service. I believe the above comments represent a fair and progressive approach to modernizing the Amateur service.

Respectfully Submitted,

Arthur P. Harris, N2AH